

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

LOANDEPOT.COM, LLC,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No.: 1:23-cv-00681-MN
	:	
MOVEMENT MORTGAGE, LLC,	:	
	:	
Defendant.	:	
	:	

**DECLARATION OF JOHN BIANCHI**

I, John Bianchi, declare as follows:

1. I am over 18 years of age and competent to testify to the matters stated in this declaration. I make this declaration based upon my personal knowledge.

2. I hold the position of Executive Vice President, National Production Manager in Market Retail at loanDepot, LLC. I have held this position since I joined loanDepot.

3. My duties and responsibilities require that I partner with executive leaders and teams across loanDepot to cultivate and enhance market presence, develop differentiated products and services, and create market penetration strategies designed to fuel growth in our Retail channel. loanDepot's team of Divisional leaders report to me, and I have oversight responsibility for more than 1,000 employees and 20,000 customer transactions each year.

4. I have general knowledge of the use of internal sourcing codes and our permitted transfer policies and procedures. However, nothing about my knowledge is unique or specific. There are many other loanDepot employees with the same knowledge and information about these topics, including, but not limited to one of my direct reports, Tom Fiddler, who holds the position of Senior Vice President, Production, and is already planning to testify in this matter.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the statements set forth above are true and correct to the best of my personal knowledge.

Executed on June 4, 2024



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JOHN BIANCHI

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